

EXHIBIT D

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE GOOGLE DIGITAL ADVERTISING
ANTITRUST LITIGATION

No. 21-MD-3010 (PKC)

This Document Relates to:
ALL ACTIONS

**DECLARATION OF [REDACTED] IN SUPPORT OF GOOGLE'S
MEMORANDUM OF LAW IN OPPOSITION TO PLAINTIFFS' MOTION FOR ORDER
COMPELLING PRODUCTION OF DOCUMENTS WITHHELD AS PRIVILEGED**

I, [REDACTED], pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am [REDACTED] at Google LLC. I have been employed by Google since March 2016 and have held my current position since May 2022. During the period from November 2017 to January 2021, I was employed by Google in the position of [REDACTED]. During the period from January 2021 to May 2022, I was employed by Google in the position of [REDACTED].

2. I have reviewed the document identified as GOOG-DOJ-08154428, which is a compilation of notes from Ads and Commerce Meetings ("ACM") from January 18, 2019, through January 31, 2020 (hereinafter "the Document").

3. I have personal knowledge of the meeting notes from June 21, 2019, on pages -469 to -471 of the Document, because I was the presenter on this topic at the meeting.

4. The redacted material on the bottom of page -469 and on page -470 in the Document reflects legal advice regarding competition laws from [REDACTED] ESQ, [REDACTED] ESQ, and [REDACTED] ESQ that was given or discussed at this meeting.

5. I submit this declaration in support of Google's Memorandum of Law in Opposition to Plaintiffs' Motion for Order Compelling Production of Documents Withheld as

Privileged in *In Re Google Digital Advertising Antitrust Litigation*, Case No. 21-MD-3010 (PKC) (S.D.N.Y.), filed on November 14, 2022.

6. The contents of this declaration are true and correct to the best of my knowledge, information, and belief, and are based on my personal knowledge of the Document. If called upon as a witness in this action, I could and would testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 11 day of November, 2022, in San Francisco.

